

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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In re:	: Chapter 9
	:
CITY OF DETROIT, MICHIGAN,	: Case No.: 13-53846
	:
Debtor.	: Hon. Steven W. Rhodes
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**INTERROGATORIES OF INTERNATIONAL UNION, UAW  
TO DEBTOR CITY OF DETROIT, MICHIGAN REGARDING PLAN CONFIRMATION**

Pursuant to Federal Rule of Bankruptcy Procedure 7033, Federal Rule of Civil Procedure 33 and the Court's April 2, 2014 Third Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtors' Plan of Adjustment [Docket #3632], the International Union, UAW ("UAW") requests that Debtor City of Detroit ("City") answer in writing and under oath the following interrogatories and serve the responses upon the undersigned counsel no later than April 25, 2014.

**DEFINITIONS**

- A. "You" and "your" refers to the City of Detroit and its agents.
- B. "DLC" means the Detroit Library Commission.
- C. "GRS" means the General Retirement System of the City of Detroit.
- D. "Identify" means to give, to the extent known, the person's full name; present or last known address; telephone number(s); and present or last known place of employment.

## **INSTRUCTIONS**

E. In answering these Interrogatories, furnish all information that is available to you or otherwise subject to your custody or control.

F. These Interrogatories shall be continuing in nature, and to the extent that answers thereto may be modified by information discovered by you subsequent to the service of your initial answers hereto, you are requested to serve promptly thereafter supplemental answers setting forth such information.

G. If you have some information responsive to a particular Interrogatory but cannot provide all of the information requested, your response should so state; provide the reasons for your inability to provide specific or full information; provide the best or most complete or most specific information that you can provide on the subject; and identify every person whom you believe has the requested information.

H. With respect to any Interrogatory to which you assert a claim of privilege, provide, at the time the Interrogatories are answered, a statement setting forth the basis for your claim of privilege and fully identifying any information withheld that may be within the scope of the request.

## **INTERROGATORIES**

1. State your position regarding whether the DLC is an entity separate from the City, and provide all facts and reasons that support and/or explain your position.

2. State your position on whether the City's plan of adjustment in the instant Chapter 9 bankruptcy case is intended to diminish or impair, and if confirmed would have the effect of diminishing or impairing, accrued pension benefits in the GRS that were earned through employment with the DLC and that are held by active DLC employees or retired former DLC employees, and provide all facts and reasons that support and/or explain your position.

3. State your position on whether, under the City's plan of adjustment, active DLC employees or retired former DLC employees who have accrued pension benefits in the GRS would be holders of "GRS Pension Claims" and would be members of "Class 11" as those terms are defined in the March 31, 2014 Amended Disclosure Statement with Respect to Amended Plan for the Adjustment of Debts of the City of Detroit [Docket No. 3382], and provide all facts and reasons that support and/or explain your position.

4. Identify each person who provided the information that you relied upon in answering these interrogatories.

5. Identify the person or persons most knowledgeable about your response to these interrogatories.

Dated: New York, New York  
April 11, 2014

International Union, UAW

By: /s/ Peter D. DeChiara  
Cohen, Weiss and Simon LLP  
Babette A. Ceccotti  
Peter D. DeChiara  
Joshua J. Ellison  
330 West 42nd Street  
New York, New York 10036-6976  
T: 212-563-4100  
F: 212-695-5436  
bceccotti@cwsny.com

Niraj R. Ganatra (P63150)  
Michael Nicholson (P33421)  
8000 East Jefferson Avenue  
Detroit, Michigan 48214  
T: (313) 926-5216  
F: (313) 926-5240  
nganatra@uaw.net  
mnicholson@uaw.net

*Attorneys for International Union, UAW*

**CERTIFICATE OF SERVICE**

I certify that on this 11<sup>th</sup> day of April 2014, I caused the foregoing document to be served on counsel for the City and for all other parties of record through the Court's CM/ECF system

/s/ *Peter D. DeChiara*  
Peter D. DeChiara